

# Anti-Bribery and Corruption Policy

## ADC Logistics Co. Ltd

In compliance with UK Bribery Act 2010 and US Foreign Corrupt Practices Act (FCPA), ADC Logistics Co. Ltd undertakes to:

- 1) Never engage in any form of bribery, either directly or through any third party.
- 2) Never offer or make an improper payment, or authorise an improper payment (cash or otherwise) to any individual, including any local or foreign official anywhere in the world.
- 3) Never attempt to induce an individual, or a local or foreign official to act illegally or improperly.
- 4) Never offer, or accept, money or anything of value, such as gifts, kickbacks or commissions, in connection with the procurement of business or the award of a contract.
- 5) Never offer or give any gift or token of hospitality to any public employee or government official or representative if there is any expectation or implication for a return favour.
- 6) Never accept any gift from any business partner if there is any suggestion that a return favour will be expected or implied.
- 7) Never facilitate payments to obtain a level of service which one would not normally be entitled to.
- 8) Never disregard or fail to report any indication of improper payments to the appropriate authorities.
- 9) Never induce or assist another individual to break any applicable law or regulation.